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May 29, 2019

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street S.W.  
Washington, D.C. 20554

Re: *Advanced Methods to Target and Eliminate Unlawful Robocalls* CG Docket No 17-59, and  
*Call Authentication Trust Anchor* WC Docket No. 17-97

Dear Ms. Dortch:

On behalf of Wisconsin's credit unions® and their more than 3.2 million members, The Wisconsin Credit Union League (the League) is writing to express its concerns over the FCC's draft Declaratory Ruling (the Ruling) and Third Further Notice of Proposed Rulemaking (FNPRM), CG Docket No 17-59 and WC Docket No. 17-97.

The League supports efforts to reduce illegal robocalls, but we are concerned that this broad Ruling – allowing phone companies to block calls to their customers by default – would stifle credit unions' ability to communicate legitimately with their members. We urge the FCC to delay the Ruling and find a solution that effectively preserves legitimate communications between credit unions and their members.

Today, consumers can choose to participate in call-blocking services. The FCC intends to reverse this practice. The Ruling would immediately give telephone carriers the ability to block calls they *suspect* to be unwanted robocalls – without regard to whether the calls are being placed by a business that has a pre-existing business relationship with a consumer and/or with the consumer's express consent. The Ruling would also let consumers block all calls to their mobile phones except those from numbers in their contact lists.

The problem is that under the Ruling, neither credit unions nor their members would know when calls are blocked. The consequences for credit union members could be significant and harmful.

Credit union members need and expect to receive certain kinds of calls and texts from their credit unions, with critical information like fraud alerts, account alerts, collection information, and so on; however, the Ruling would erode credit unions' ability to inform members about privacy, account activity, data breaches, or potential fraud – actually harming consumers. This cannot be what the FCC intends.

We worry that consumers won't be sufficiently warned about the consequences of blocking calls by default nor given enough information to manage personal "white lists" effectively. This could endanger consumers' financial well-being in any number of ways. For example, consumers could:

- Face liability for unauthorized debit or credit card use if their credit unions cannot reach them with timely fraud alerts;
- Incur overdraft fees or over-the-limit fees if they do not receive account alerts from their credit unions;

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**The Wisconsin Credit Union League**

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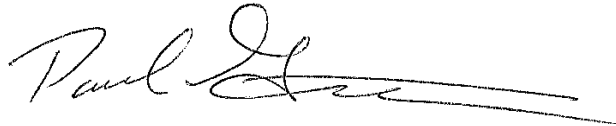
Phone: (608) 640-4040 (800) 242-0833 Fax: (262) 549-7722 Web: [www.theleague.coop](http://www.theleague.coop)

- Be subjected to adverse credit reporting and late payment fees if credit unions cannot send them critical notices about delinquent accounts;
- Risk becoming the victims of identity theft if they miss data breach notices from credit unions and other financial institutions; and
- Miss critical deadlines in the lending process if they apply for credit union loans and need to be called by loan officers but don't have those loan officers' numbers stored as contacts in their phones.

We're also concerned that the Ruling would endanger safe and sound credit union practices. For example, the Consumer Financial Protection Bureau, the National Credit Union Administration and other financial regulators have encouraged financial institutions to use modern communication methods to provide time-sensitive account information to members. The Ruling would interfere with those efforts.

The FCC should do more to distinguish between illegal callers and calls from legitimate businesses that have existing relationships with consumers. Furthermore, since the FCC's order would become effective upon adoption, the FCC should take more time to consider stakeholder concerns. The FCC should delay the Ruling and find a solution to illegal robocalls that effectively preserves legitimate communications between credit unions and their members.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Guttormsson", with a long horizontal flourish extending to the right.

Paul Guttormsson  
Vice President of Legal & Compliance  
The Wisconsin Credit Union League